

ITEM NO. CA1

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: February 20, 2024**

REGULAR CONSENT EFFECTIVE DATE February 21, 2024

DATE: February 6, 2024

TO: Public Utility Commission

FROM: Scott Shearer and Lucy Mondragon

THROUGH: Bryan Conway and Marc Hellman **SIGNED**

SUBJECT: CASCADE NATURAL GAS:
(Docket No. ADV 1586/Advice No. O24-01-01)
Requests Revisions to the Definitions of Residential and Commercial Customers.

STAFF RECOMMENDATION:

Staff recommends the Commission approve Cascade Natural Gas' (CNG or Company) request, subject to conditions, to update Sheets 2.1 and 2.2 in its tariff. Specifically, to update the definitions of residential and commercial customers.

DISCUSSION:

Issue

Whether the Commission should approve CNG's request to update the definitions of residential and commercial customers.

Applicable Rule or Law

ORS 757.205(1), a public utility must file schedules showing all rates, tolls, and charges for service that have been established and are in force at the time.

ORS 757.210(1) The Commission may approve tariff changes if they are deemed to be fair, just, and reasonable.

ORS 757.220 Filings that make any change in rates, tolls, charges, rules, or regulations must be filed with the Commission at least 30 days before the effective date of the

changes. Tariff revisions or corrections may be made by filing revised sheets with the information required under the Commission's administrative rules, including.

OAR 860-021-0008 provides the broad definitions for service, including customer.

Analysis

CNG states the reason for the change in definitions is:

The purpose of this filing is to revise the definitions of residential and commercial customers to provide greater clarity to Cascade's field employees. The Company is simultaneously revising the same definitions in its Washington Tariff for systemwide consistency. The language revisions add clarity and are not substantive; they will not result in a need to reclassifying the service designation of any existing customers.

Staff reviewed the changes in the tariffs and compared the changes to the definitions listed in OAR 860-021-0008 for compliance.

Energy Justice

The Citizens' Utility Board (CUB) mentioned a concern to the Commission's Energy Justice Program Manager, about the language that could have a potential effect on low-income households' access to assistance funding. Specifically, tenants of buildings with master metered facilities, where the customer is the building owner, but the tenant qualifies for energy assistance funding. The concern was the new language could potentially remove residential customers from qualifying for assistance, as the location would now be considered "commercial" under the new definitions. The Commission previously addressed this concern for PacifiCorp, in Docket No. ADV 1431.

On January 30, 2024, Staff met with CNG to discuss the concern. CNG confirmed that the new language does not affect customers, it is simply for consistency clarity for their field staff and to match up the definitions in it's Washington and Oregon territories. Additionally, CNG's cover letter states "*The language revisions add clarity and are not substantive; they will not result in a need to reclassifying the service designation of any existing customers.*" CNG also indicated that they did not serve any master metered residential customers that they were aware of. They agreed to review their customer base and confirm that there are no residential master metered customers in their system. On January 31, 2024, CNG confirmed this via email.

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CNG, CUB, and Staff all agreed that this topic should be addressed as a part of Docket No. UM 2211 discussion related to programs to address energy burden.¹

Both CNG and CUB have reviewed a copy of this memo and voiced no concerns.

Conclusion

Based on its review of the Company's filing, Staff concludes the changes in the definitions of residential and commercial customers are reasonable and meet the required minimum definitions for service, with the condition that, subject to outcome of Docket No. UM 2211, additional changes may be required of CNG's tariff and definitions.

PROPOSED COMMISSION MOTION:

Approve Cascade Natural Gas' request to update Sheets 2.1 and 2.2 in its tariff, revising the definitions of residential and commercial customers, subject to the outcome of Docket No. UM 2211.

ADV 1586 CNG Advice O24-01-01

¹ See *In the Matter of Public Utility Commission of Oregon, Implementation of House Bill 2475*, Docket No. UM 2211, Staff's Letter to Stakeholders Providing Implementation Strategy Update, Dec. 22, 2021.